

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JACQUES RIVERA,)
Plaintiff,) No. 12 CV 004428
v.)
REYNALDO GUEVARA, et al.,)
Defendants.) The Honorable Joan B. Gottschall

**UNOPPOSED MOTION FOR SHORT EXTENSION OF TIME TO FILE
SUMMARY JUDGMENT AND MOTION FOR LEAVE TO FILE OVERSIZED BRIEFS**

Defendants Reynaldo Guevara, Steve Gawrys, Daniel Noon, Joseph Fallon, Joseph Sparks, Paul Zacharias, John Guzman, Gillian McLaughlin, the Estate of John Leonard, Edward Mingey, Russell Weingart and Rocco Rinaldi (“Defendant Officers”), and Defendant City of Chicago, by their attorneys, and with no objections from Plaintiff, move this Court for a short extension of time to file their motions for summary judgment and for leave to file oversized briefs and state:

1. Defendants’ motions for summary judgment are currently due on Friday, August 18, 2017. The Defendant Officers and the City are filing separate motions on the distinct claims against them.
2. Due to a number of both personal and professional obligations, Defendants request a short extension of three business days, until Wednesday, August 23, to file their motions.
3. Also, Defendants each move this Court for leave to file oversized briefs. Each of Defendants’ motions, which are case-dispositive, involves a large number of complex claims, issues and facts. The twelve individual Defendant Officers’ motion must address claims of

Brady violations, fabrication of evidence, manipulation of a witness, conspiracy, failure to intervene, malicious prosecution, and intentional infliction of emotional distress; the City must address several broad *Monell* claims.

4. In light of the number and complexity of the claims, Defendants ask leave to file oversized briefs of an additional ten pages each. That said, Defendants are very hopeful their final briefs will not reach that number of additional pages.

5. Consistent with their motions, Defendants also move to adjust the full briefing schedule by an additional three business days, and Defendants have no objection if Plaintiff requests additional pages for his own oversized briefs.

6. This motion is not being made for the purpose of causing undue delay, and will not result in prejudice to any party.

7. Counsel for Defendants have communicated with counsel for Plaintiff regarding these motions, and Plaintiff has stated he has no objection.

WHEREFORE, Defendants request this Court extend the time that Defendants' summary judgment motions are due by three days, to August 23, 2017, to adjust the remaining briefing schedule accordingly, and to allow Defendants to each file oversized memoranda in support of up to 25 pages each.

Date: August 15, 2017

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury pursuant to 28 U.S.C.A. § 1746 that on August 15, 2017, I electronically filed the foregoing **Defendants' Unopposed Motion for Short Extension of Time to File Summary Judgment and Motion for Leave to File Oversized Briefs** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants below.

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